

EXHIBIT “5”

In the Matter Of:
BRYSON vs ROUGH COUNTRY

2:22-CV-017-RWS

SANTANA BRYSON

April 12, 2023



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1 had stopped, at the end of her driveway, and we
2 switched.

3 And that's when I seen that Cohen was
4 asleep in the rearview mirror. We didn't check on
5 him, but we drove down the dirt road and we went down
6 that. It's complicated. But if you look up on the
7 maps, we went down that one road and we were at the
8 stop sign of the blossom -- I don't think it's
9 Blossom Valley cause where she lives -- I don't know.
10 But there's, like -- it's a dirt road and then a
11 road. We got on the actual paved road. And
12 that's when we noticed, oh, he's already asleep; that
13 was quick, you know. And then we just headed on from
14 there.

15 Q So within a couple of minutes of getting in
16 the car he'd fallen asleep?

17 A Yeah. He was gone. He hadn't taken a nap
18 all day. He had played himself. He was tired.

19 Q Okay. And then while you were driving
20 could you see -- he was, he was seated behind you;
21 Cohen was, correct?

22 A Yes, ma'am.

23 Q Could you see him in the rear view mirror
24 while you were driving?

25 A Yes, ma'am.

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1 Q And was he asleep, to your knowledge, up
2 until the accident?

3 A Yes, ma'am.

4 Q Okay. Did he -- do you know if he, like,
5 had a paci or anything like that --

6 A No.

7 Q -- with him in the car seat? "No"?

8 A He didn't, he didn't take paci since a year
9 old. And he didn't take a bottle since a year old
10 either. We took those away at a year old.

11 Q Okay. And could you tell he was asleep
12 just cause his eyes were shut, or was he sort of,
13 like, leaned over or --

14 A He -- his eyes were shut and he was to the
15 side.

16 Q Is that to the right? If you're in the
17 seat --

18 A Yes.

19 Q -- to his right?

20 A In the mirror, he was on the right. Like I
21 was looking in the rearview mirror and his head was
22 to the right-hand side.

23 Q Okay. But so if you're -- if you are Cohen
24 sitting in the car seat, if you're directing which
25 way his head was tipped would it be, like, his right

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1 up in?

2 A Yes.

3 Q Okay. Are lifted trucks pretty common in
4 Shannon, Georgia area?

5 A I wouldn't say "common," but they're not
6 irrelevant either. I would say maybe like two out of
7 ten cars that you would see maybe.

8 Q Are lifted?

9 A Yes.

10 Q Okay. And the boyfriend Jacob Taylor that
11 had the lifted truck, is that the vehicle he drove
12 the whole time that you all were dating?

13 A No. It was, it was just a truck that he
14 kept for a very short period of time. His dad had
15 got it for him. And he just drove it for maybe like
16 a month or two and then the lift broke on it, so he
17 had to sell it.

18 Q And when you -- what do you mean by "the
19 lift broke"?

20 A I don't know. I just was told that the
21 lift broke, so he sold it. That's all I know about
22 that.

23 Q Okay. Aside from Jacob Taylor, do you have
24 any family members that have ever had lifted trucks,
25 to your knowledge?